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Before the Federal Communications Commission Washington, D.C. 20554

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Federal Communication Commission Bureau / Office

In the Matter of)	
A 1)	MD D. J. W. OS OSS
Amendment of Section 73.202(b),)	MB Docket No. 03-222
Table of Allotments,)	RM-10812
FM Broadcast Stations.)	
(Charlotte and Grand Ledge, Michigan))	

To: Assistant Chief, Audio Division, Media Bureau

COMMENTS OF RUBBER CITY RADIO GROUP

Rubber City Radio Group ("RCRG"), licensee of Station WQTX(FM) ("WQTX"), Channel 224A, Charlotte, Michigan, by it counsel, hereby submits its comments in support of a proposal described in a Notice of Proposed Rule Making released by the Commission in this proceeding on October 24, 2003 (DA 03-3228) to amend the FM Table of Allotments by modifying the license of Station WQTX to specify operation on 225A and by changing Station WQTX's community of license from Charlotte to Grand Ledge, Michigan.

As shown in its Petition for Rule Making, which is hereby incorporated by reference, RCRG seeks to invoke the provisions of Section 1.420(i) of the Commission's rules which permits the modification of a station's authorization to specify a new community of license without affording other interested parties an opportunity to file competing expressions of interest. See *Modification of FM and TV Authorization to Specify a New Community of License*, 4 FCC Rcd 4870 (1989), recon. Granted in part, 5 FCC Rcd 7094 (1990). The proposed use of Channel 225A at Grand Ledge is mutually exclusive with Station WQTX's existing authorization at Charlotte.

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RCRG hereby states that if the Commission grants the above proposal, it will file an application to operate on Channel 225A at Grand Ledge and will construct the facilities promptly if its construction permit is granted.

Respectfully submitted,

RUBBER CITY RADIO GROUP

By:

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Its Counsel

December 11, 2003

CERTIFICATE OF SERVICE

I hereby certify that on this 11day of December, 2003, I caused copies of the foregoing Comments of Rubber City Radio Group to be delivered by first class United States mail, postage prepaid, to the following:

John A. Karousos Assistant Chief, Audio Division Media Bureau Federal Communications Commission 445 Twelfth Street, S.W. Washington, D.C. 20554

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Sharmon Truesdale